

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

MAKE THE ROAD NEW YORK, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY, *et al.*,

Defendants.

No. 18-cv-2445 (NGG) (TAM)

**JOINT STATUS REPORT**

Pursuant to the Court's Order of August 17, 2022, the parties submit the following report on the progress of negotiations.

On September 13, 2022 and September 22, 2022, the parties met and conferred regarding Plaintiffs' May 24, 2022 settlement proposal and Defendants' counter-proposal. The parties believe that they have made some progress towards reaching a settlement with regard to the FOIA documents challenged in this litigation. At this time, the Defendant agencies are continuing to consider Plaintiffs' most recent settlement proposal with regard to the FOIA documents, and they expect to respond to that proposal within the next 30 days.

The parties respectfully request that they be permitted to file a further joint status report on November 14, 2022, updating the Court on the progress of their negotiations, and, if appropriate, proposing a schedule for further proceedings.

Dated: September 30, 2022

/s/ Joshua T. Stehlik (by permission)

Respectfully submitted,

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